

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

THOMAS GORCZYNSKI, on behalf
of himself and all others similarly
situated,

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS,
INC., et al.,

Defendants.

Civil No. 18-10661-RMB-KMW

ORAL ARGUMENT REQUESTED

PLAINTIFF'S NOTICE OF MOTION FOR CLASS CERTIFICATION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, upon the Declaration of Simon B. Paris, the exhibits attached thereto, and the accompanying Memorandum of Law, Plaintiff Thomas Gorczynski will move before the Honorable Renee Marie Bumb, United States District Court Judge, at the United States District Court for the District of New Jersey located at the Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets 1050, Camden, New Jersey 08101, on March 27, 2020 pursuant to this Court's January 31, 2020 Amended Scheduling Order (ECF No. 103), for an Order pursuant to Rule 23(b)(3) to certify the following Class: All persons who purchased a "Microwave" in New Jersey since May 10, 2012. Microwave is a defined term to include each of following microwave models Electrolux sold into New Jersey: FFMV152CLW; FFMV162LW; FFMV154CLS; FFMV164LS; LFMV164QF; FGBM205KF; FGMV174KF; FGMV174KM; FGMV154CLF; FGMV175QF; and FGMV205KF; to appoint Plaintiff Gorczynski as the Class Representative; and to appoint Saltz, Mongeluzzi & Bendesky, P.C. as Class Counsel.

Respectfully submitted,

DATE: March 27, 2020

By: /s/ Simon B. Paris

Simon B. Paris

Patrick Howard (PA ID #88572)

Charles J. Kocher (PA ID #93141)

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Proposed Class**